

Tyler Green*
Cameron T. Norris*
James P. McGlone*
CONSOVOY MCCARTHY PLLC
1600 Wilson Blvd., Ste. 700
Arlington, VA 22209
(703) 243-9423
tyler@consovovymccarthy.com
cam@consovovymccarthy.com
jim@consovovymccarthy.com

Kory Langhofer, Ariz. Bar No. 024722
Thomas Basile, Ariz. Bar. No. 031150
STATECRAFT PLLC
649 North Fourth Avenue, First Floor
Phoenix, Arizona 85003
(602) 382-4078
kory@statecraftlaw.com
tom@statecraftlaw.com

Attorneys for Proposed Intervenor-Defendants

*pro hac vice forthcoming

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Mi Familia Vota, et al.,
Plaintiffs,

V.

Katie Hobbs, et al.,
Defendants

and

Republican National Committee; National Republican Senatorial Committee; Republican Party of Arizona; Gila County Republican Party; and Mohave County Republican Central Committee.

Case No: 2:22-cv-00509-SRB

**[PROPOSED] ANSWER OF
[PROPOSED] INTERVENOR-
DEFENDANTS**

1 Intervenors—the Republican National Committee, National Republican Senatorial
2 Committee, Republican Party of Arizona, Gila County Republican Committee, and Mo-
3 have County Republican Central Committee—now answer Plaintiffs' complaint (Doc. 1).
4 Unless expressly admitted below, every allegation in the complaint is denied. When Inter-
5 venors say something “speaks for itself,” they mean that they lack sufficient information
6 to admit or deny the allegation. Because Plaintiffs often cite nothing, Intervenors do not
7 know whether the referenced factual material exists, is accurate, or is placed in proper
8 context. Accordingly, Intervenors state:

- 9 1. Legal argument requiring no response; otherwise, deny.
- 10 2. Legal argument requiring no response.
- 11 3. Legal argument requiring no response.
- 12 4. Voter statistics speak for themselves; otherwise, deny.
- 13 5. Officials' statements and allegations in lawsuits speak for themselves; Inter-
14 venors lack sufficient knowledge to admit or deny the remaining allegations.
- 15 6. Legal argument requiring no response.
- 16 7. Legal argument requiring no response.
- 17 8. Legal argument requiring no response.
- 18 9. Admit.
- 19 10. Admit.
- 20 11. Admit.
- 21 12. Admit.
- 22 13. Legal argument requiring no response.
- 23 14. Intervenors lack sufficient knowledge to admit or deny.
- 24 15. Intervenors lack sufficient knowledge to admit or deny.
- 25 16. Intervenors lack sufficient knowledge to admit or deny.
- 26 17. Admit that Defendant Hobbs is Secretary of State of Arizona; the rest is legal
27 argument requiring no response.

- 1 18. Admit that Defendant Brnovich is the Attorney General of Arizona; the rest
2 is legal argument requiring no response.
- 3 19. Legal argument requiring no response.
- 4 20. Admit.
- 5 21. Admit.
- 6 22. Admit.
- 7 23. Admit.
- 8 24. Admit.
- 9 25. Admit.
- 10 26. Admit.
- 11 27. Admit.
- 12 28. Admit.
- 13 29. Admit.
- 14 30. Admit.
- 15 31. Admit.
- 16 32. Admit.
- 17 33. Admit.
- 18 34. Admit.
- 19 35. Deny.
- 20 36. Legal argument requiring no response.
- 21 37. Legal argument requiring no response.
- 22 38. Legal argument requiring no response.
- 23 39. Legal argument requiring no response; otherwise, deny.
- 24 40. The litigation history and allegations speak for themselves; the rest is legal
25 argument requiring no response.
- 26 41. Intervenors lack sufficient knowledge to admit or deny.
- 27 42. Intervenors lack sufficient knowledge to admit or deny.
- 28 43. Intervenors lack sufficient knowledge to admit or deny.

- 44. Intervenors lack sufficient knowledge to admit or deny.
- 45. Intervenors lack sufficient knowledge to admit or deny.
- 46. Intervenors lack sufficient knowledge to admit or deny.
- 47. Intervenors lack sufficient knowledge to admit or deny.
- 48. Intervenors lack sufficient knowledge to admit or deny.
- 49. Intervenors lack sufficient knowledge to admit or deny.
- 50. Legal argument requiring no response; otherwise, Intervenors lack sufficient
edge to admit or deny.
- 51. Legal argument requiring no response.
- 52. Intervenors lack sufficient knowledge to admit or deny.
- 53. Deny as to the final sentence; the rest is legislative background which speaks
elf.
- 54. Legal argument requiring no response.
- 55. Legal argument requiring no response.
- 56. Legal argument requiring no response.
- 57. Legal argument requiring no response.
- 58. Legal argument requiring no response.
- 59. Legal argument requiring no response.
- 60. Legal argument requiring no response.
- 61. Legal argument requiring no response.
- 62. Legal argument requiring no response.
- 63. Legal argument requiring no response.
- 64. Legal argument requiring no response; otherwise, deny.
- 65. Legal argument requiring no response.
- 66. Legal argument requiring no response.
- 67. Legal argument requiring no response.

CLAIMS

Count I: Unjustifiable Burden on the Right to Vote U.S. Const. amend. I, XIV, 42 U.S.C. §1983

68. Intervenor-Defendants incorporate by reference all foregoing responses to Plaintiffs' allegations as though fully set forth in this paragraph.

69. Legal argument requiring no response.

70. Legal argument requiring no response.

71. Legal argument requiring no response.

72. Legal argument requiring no response.

Count II: Denial of Procedural Due Process U.S. Const. amend. XIV, 42 U.S.C. § 1983

9 73. Intervenor-Defendants incorporate by reference all foregoing responses to
0 Plaintiffs' allegations as though fully set forth in this paragraph.

74. Legal argument requiring no response.

75. Legal argument requiring no response.

76. Legal argument requiring no response.

77. Legal argument requiring no response.

RESPONSE TO PRAYER FOR RELIEF

Intervenors deny that Plaintiff is entitled to any relief.

AFFIRMATIVE DEFENSES

1. The allegations in the complaint fail to state a claim.
 2. Plaintiffs' requested relief is barred by the *Purcell* principle.

1 Respectfully submitted on May 12, 2022.

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3 By: /s/ Kory Langhofer

4 Kory Langhofer, Ariz. Bar No. 024722
5 Thomas Basile, Ariz. Bar. No. 031150
6 STATECRAFT PLLC
7 649 North Fourth Avenue, First Floor
8 Phoenix, Arizona 85003
9 (602) 382-4078
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cam@consovoymccarthy.com
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